

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

PHILIP A. MURPHY, Jr.
SANDRA R. NOE, and
CLAIRE M. PALMER,
Individually, and as Representatives of plan
Participants and plan beneficiaries of
Verizon's Pension Plans
Involuntarily re-classified and treated as
Transferred into SuperMedia's Pension
Plans

Plaintiffs,

v.

VERIZON COMMUNICATION INC.,
VERIZON CORPORATE SERVICES
GROUP INC.,
VERIZON EMPLOYEE BENEFITS
COMMITTEE,
VERIZON PENSION PLAN FOR NEW YORK
AND NEW ENGLAND ASSOCIATES,
VERIZON MANAGEMENT PENSION PLAN,
VERIZON ENTERPRISES MANAGEMENT
PENSION PLAN,
VERIZON PENSION PLAN FOR MID-ATLANTIC
ASSOCIATE,
SUPERMEDIA EMPLOYEE BENEFITS
COMMITTEE,

Defendants

CIVIL ACTION NO. 3:09-CV-2262-G

CONSOLIDATED WITH
CIVIL ACTION NO. 3:12-CV-2034-G

**DEFENDANTS COMMUNICATION WORKERS OF AMERICA,
AFL-CIO, LOCAL 1301'S AND LOCAL 1302'S
MOTION FOR AN EXTENSION OF TIME TO RESPOND**

COMES NOW, Defendants Communication Workers of America, AFL-CIO, Local 1301 ("CWA Local 1301") and Communication Workers of America, AFL-CIO, Local 1302 ("CWA, Local 1302") (or jointly referred to as "the Union Defendants") and file this unopposed motion for an extension of time and would show as follows:

1. Defendant CWA Local 1301 was served with the complaint in Case 3:12-CV-2034-G and currently its answer and/or responsive pleadings are due July 26, 2012. Defendant

CWA Local 1302, has yet to be served but the undersigned counsel have agreed to accept service on behalf of that defendant and have advised Plaintiffs of the same. Defendants CWA Local 1301 and CWA Local 1302 need additional time to consider and prepare the appropriate responses to the complaint and the extensive exhibits attached thereto.

2. The Union Defendants will be represented by Shelley Kroll and Indira Talwani of Segal, Roitman, LLP who are in the process of filing motions for admission pro hac vice, and Yona Rozen, as local counsel. Yona Rozen contacted the Consolidated Plaintiff's Counsel, Scott Drake regarding this motion and was advised that the Consolidated Plaintiffs, SuperMedia, Inc. et al. would agree to a 45 day extension to file responsive pleadings, beyond July 26, 2012.

3. This motion is necessary in order to allow sufficient time for counsel for the Union Defendants to review the massive initial filing and to research and prepare appropriate responsive pleadings and is not for the purpose of unduly delaying the proceedings.

WHEREFORE, the Union Defendants respectfully request that the motion be granted and that they be allowed a 45 day extension, beyond July 26, 2012, up to and including September 14, 2012 for filing an answer and/or other responsive pleadings.

Dated: July 20, 2012

Respectfully submitted,

/s/ Yona Rozen

Yona Rozen-**Local Counsel**

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Motion for admission *pro hac vice* pending

Shelley B. Kroll

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Motion for admission *pro hac vice* pending

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COUNSEL FOR COMMUNICATION

WORKERS OF AMERICA, AFL-CIO, LOCAL 1301

AND LOCAL 1302

CERTIFICATE OF CONFERENCE

On Tuesday July 17, 2012 the undersigned attempted to contact and left a message for Richard Krumholz for the purpose of conferring regarding this motion. Later that afternoon, Scott Drake returned that call, discussed this motion, and indicated he would respond further after consulting the clients. On July 20, 2012 Mr. Drake advised by email, and confirmed by phone that they would agree to a 45 day extension. Accordingly, the undersigned is filing the instant motion for a 45 day extension as an unopposed motion.

/s/ Yona Rozen

Yona Rozen

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record via electronic delivery through the Court's ECF filing system on July 20, 2012.

/s/ Yona Rozen

Yona Rozen